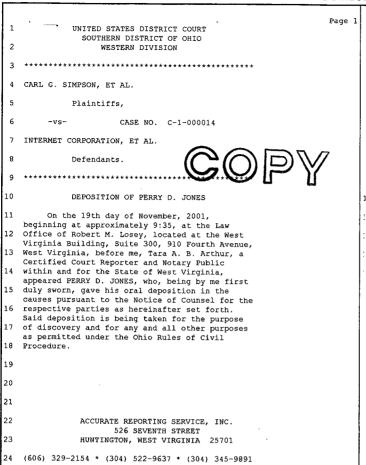
EXHIBIT C



HOAFMBEK 5001

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1 you have to lock it out.

2 Q. Okay. But when you're operating the

3 machine -- you're not supposed to have it locked

4 out when you're operating the machine; is that 5 correct?

6 A. No, but you're supposed to have

7 something else just as equivalent to that, and

8 that is something that will prevent injury, and

9 that's guarding.

10 Q. And you think that's the equivalent of 11 a lockout/tagout procedure?

12 A. I think -- let me back up a minute and

13 make sure my comment is understood, okay?

14 If you're going to perform work on a

16 Q. (Interposing) Could you clarify "work"

17 in the sense of operating the machine or

18 maintenance on the machine?

19 A. Doesn't matter.

20 Q. You're not going to make a

21 classification between those two?

22 A. No. No. For this purpose, I'm not.

23 If you're going to get into the

24 machine to perform any kind of work and you have

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1 to -- in order to do that, you have got to

2 remove the guarding. Under normal operating

3 conditions, you're not allowed to get in there.

4 You're supposed to have a guard that will

5 prevent you from getting in there, okay?

Any time the machine is operating, for

7 any reason, that's the basic requirement of

8 machine guarding, which has been around for

9 probably 50 years or more. You don't use a

10 machine that exposes a person to moving parts

11 without guarding those parts to keep that

12 employee from getting in there.

Now, if you take the guard off so that

14 an employee can get inside, then the

15 lockout/tagout standard serves the same purpose,

16 it prevents that employee from getting injured

17 while he's doing his job, just as a guard does

18 to protect the employee when he's outside of the 19 machine doing his job.

20 Q. Okay.

A. One doesn't replace the other. They

22 have different functions, but they are both

23 intended to prevent accidents and subsequent

24 injuries to employees.

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Q. So if you were getting into the point

1 2 of operation on the Sutter to perform

3 maintenance and service, you wouldn't have

4 guards up because you would have the

5 lockout/tagout procedure instead of the guards;

6 is that correct?

A. Well, that's correct, assuming that

8 you cannot do that job with the guard in place.

9 Q. Okay. You testified earlier that you

10 couldn't find anything, any evidence, showing

11 that there had been inspections on Sutters; is

12 that correct?

A. No, ma'am. That's not correct. 13

Q. Okay. You said you reviewed --14

A. (Interposing) I testified --15

Q. (Continuing) -- material regarding 16

17 inspections of the Sutters; is that correct?

A. No. I testified that there was a

19 total absence of any evidence that a periodic

20 inspection of the lockout procedures for the

21 Sutter machine had ever been done. I haven't

22 provided testimony that an inspection had never

23 been done of the machine.

Q. Okay. You just couldn't find any